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1	In accordance with Civil Local Rule 16-9(a) and this Court's Order dated August 5, 2025		
2	(Dkt. 53), Defendant and Counterclaimant Perplexity AI, Inc. ("Perplexity") submits this		
3	Supplemental Case Management Statement, which supplements and amends Perplexity's		
4	positions set forth in the Joint Case Management Statement & Proposed Order previously filed		
5	jointly by the parties on May 13, 2025 (Dkt. 39). Because Plaintiff and Counterdefendant		
6	Perplexity Solved Solutions Inc. ("PSSI") is not represented by counsel (see Dkt. 53), Perplexity		
7	submits this supplemental statement separately. See N.D. Cal. L.R. 16-9(a) ("If one or more of		
8	the parties is not represented by counsel, the parties may file separate case management		
9	statements.").		
10	On July 18, 2025, PSSI's then-counsel (Mitchell Silberberg & Knupp LLP,		
11	Ms. Lackman, and Ms. Lewis (collectively, "MSK")) moved to withdraw from this case, citing		
12	an unspecified "breakdown in [their] relationship with PSSI," and indicating that PSSI had been		
13	informed of the need to obtain new counsel as early as June 20, 2025. Dkt. 50 at 2, 4. On		
14	August 5, 2025, the Court granted the motion to withdraw, on the condition that papers may		
15	continue to be served on MSK for forwarding purposes until PSSI retains new counsel. See		
16	Dkt. 53 at 2-3.		
17	The Court also required new counsel to appear on PSSI's behalf "by September 5, 2025."		
18	Id. at 3. The Court's order further cautioned:		
19	As PSSI is a corporation and 'a corporation may appear in the federal courts only		
20	through licensed counsel,' [PSSI] is advised that failure to retain substitute counsel may result in the entry of default judgment on counterclaims against it		
21	and dismissal of its action against [Perplexity].		
22	Id. at 2-3 (internal citations omitted). September 5, 2025 has passed, and no new counsel has		
23	appeared in this action on PSSI's behalf. Accordingly, Perplexity intends to seek dismissal or		
24	PSSI's claims and entry of default judgment against PSSI on Perplexity's counterclaims.		

PSSI's claims and entry of default judgment against PSSI on Perplexity's counterclaims.

Given the current status of this case, Perplexity submits that the Case Management Conference currently scheduled for September 17, 2025 should be taken off calendar. However, Perplexity remains available at the Court's convenience to provide any further information that would be of assistance to the Court, if needed.

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1	Dated: September 10, 2025	Respectfully submitted,	
2		/s/ Jennifer L. Barry Jennifer L. Barry (Bar No. 228066)	
3		jennifer.barry@lw.com Patrick C. Justman (Bar No. 281324)	
4		patrick.justman@lw.com Melanie J. Grindle (Bar No. 311047)	
5		melanie.grindle@lw.com Adam A. Herrera (Bar No. 328043)	
6		adam.herrera@lw.com LATHAM & WATKINS LLP	
7		12670 High Bluff Drive San Diego, CA 92130	
8		858.532.5400 / 858.523.5450 Fax	
9		Attorneys for Defendant and Counterclaimant Perplexity AI, Inc.	
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1	<u>CERTIFICATE OF SERVICE</u>		
2	In accordance with Civil Local Rule 11-5(b) and this Court's Order dated August 5, 2025		
3	(Dkt. 53), I certify that on September 10, 2025, I caused a copy of the foregoing document to be		
4	served via electronic mail upon the counsel listed below:		
5	Eleanor M. Lackman Marissa B. Lewis		
6	MITCHELL SILBERBERG & MITCHELL SILBERBERG & KNUPP LLP		
7	2049 Century Park East, 18th Floor Los Angeles, CA 90067-3120 437 Madison Avenue, 25 th Floor New York, NY 10022		
8	212.878.4890 / 971.545.7675 Fax 212.509.3900		
9	eml@msk.com mbl@msk.com		
10	Dated: September 10, 2025 /s/ Jennifer L. Barry Jennifer L. Barry (Bar No. 228066)		
11	LATHAM & WATKINS LLP 12670 High Bluff Drive		
12	San Diego, CA 92130 858.523.5400 / 858.523.5450 Fax		
13	jennifer.barry@lw.com		
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